

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Garrett A. Fail

*Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et al.* : 08-13555 (SCC)  
: :  
Debtors. : (Jointly Administered)  
----- X

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746  
REGARDING CERTAIN OMNIBUS OBJECTIONS TO CLAIMS**

TO THE HONORABLE SHELLEY C. CHAPMAN,  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the “Case Management Order”), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan Administrator”), filed the following omnibus claims objections (each, an “Objection”) with the Court on November 22, 2017:

- a. The Plan Administrator’s Five-Hundred Twenty-Second Omnibus Objection to Claims (Satisfied Guarantee Claims) [ECF No. 57039] (the “LBT Objection”)
- b. The Plan Administrator’s Five-Hundred Twenty-Third Omnibus Objection to Claims (Satisfied Guarantee Claims) [ECF No. 57040] (the “LBS Objection”)

2. In accordance with the Case Management Order, the Plan Administrator established a deadline for parties to object or file responses to each Objection (each as applicable, a "Response Deadline").

3. Pursuant to paragraph 37 of the Case Management Order, pleadings may be granted without a hearing if, among other things, no objections or other responsive documents have been filed on or prior to the applicable Response Deadline.

4. The Response Deadlines have passed more than 48 hours ago.

5. To the best of my knowledge, no responses to either Objection have been filed with the Court on the docket of these cases in accordance with the Case Management Order or served on counsel to the Plan Administrator.

6. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Objections annexed hereto as Exhibit A and Exhibit B, which are substantively unmodified since the filing of the Objections, be entered in accordance with the procedures described in the Case Management Order.

Dated: January 3, 2018  
New York, New York

/s/ Garrett A. Fail  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Garrett A. Fail

*Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**EXHIBIT A**  
**(Proposed Order – ECF No. 57039)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
**Debtors.** : **(Jointly Administered)**  
-----x

**ORDER GRANTING THE PLAN  
ADMINISTRATOR'S FIVE-HUNDRED TWENTY-SECOND OMNIBUS  
OBJECTION TO CLAIMS (STRUCTURED SECURITIES GUARANTEE CLAIMS)**

Upon the five-hundred twenty-second omnibus objection to claims, dated November 22, 2017 (the “Objection”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, pursuant to sections 105(a) and 1142 of title 11 of the Bankruptcy Code, Rule 3007(d) of the Bankruptcy Rules, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (ECF No. 6664), seeking to deem satisfied in full in accordance with the Plan Satisfied ISIN Claims, all as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Satisfied ISIN Claims listed on Exhibit 1 annexed hereto are deemed satisfied in full in accordance with the Plan; and it is further

ORDERED that neither the Plan Administrator nor LBHI shall make any further Distributions on account of the Satisfied ISIN Claims listed on Exhibit 1 annexed hereto; and

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT B**  
**(Proposed Order – ECF No. 57040)**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (SCC)  
: :  
Debtors. : (Jointly Administered)  
-----x

**ORDER GRANTING THE PLAN  
ADMINISTRATOR'S FIVE-HUNDRED TWENTY-THIRD OMNIBUS  
OBJECTION TO CLAIMS (STRUCTURED SECURITIES GUARANTEE CLAIMS)**

Upon the five-hundred twenty-third omnibus objection to claims, dated November 22, 2017 (the “Objection”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, pursuant to sections 105(a) and 1142 of title 11 of the Bankruptcy Code, Rule 3007(d) of the Bankruptcy Rules, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (ECF No. 6664), seeking to deem satisfied in full in accordance with the Plan Satisfied ISIN Claims, all as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Satisfied ISIN Claims listed on Exhibit 1 annexed hereto are deemed satisfied in full in accordance with the Plan; and it is further

ORDERED that neither the Plan Administrator nor LBHI shall make any further Distributions on account of the Satisfied ISIN Claims listed on Exhibit 1 annexed hereto; and

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE